



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 2, 2014

BY EMAIL AND ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Centre Street
New York, New York 10007

Re: United States v. Antione Chambers et al.,
S2 13 Cr. 345 (LGS)

Dear Judge Schofield:

The Government, after conferring with counsel for the defendant Antione Chambers and Tyrone Brown, respectfully writes this letter as directed by the Court at the last pretrial conference regarding (1) the date by which the Government shall produce material to the defense pursuant to 18 U.S.C. § 3500 ("3500 Material"); and (2) whether there is any objection to the Court holding the suppression hearing on September 8, 2014 at 11:00 a.m. Although it appears that the parties have reached an agreement about the timing of the production of 3500 Material, the parties do not agree on whether a protective order should govern the 3500 Material, and accordingly, the Government will file a motion for a protective order on or before September 8, 2014. With respect to the suppression hearing, the parties are prepared to proceed with the hearing on September 8, 2014 at 11:00 a.m.

On August 29, 2014, the Government emailed a proposed schedule to defense counsel for the production of 3500 Material. That schedule contemplates the production of 3500 Material for law enforcement witnesses on September 19, 2014, and for civilian witnesses on September 26, 2014. The Government also indicated that it would be seeking a protective order for the 3500 Material and circulated a proposed stipulation governing the dissemination of the 3500 Material. Neither counsel objected to the schedule for the production of 3500 Material; however, counsel for Brown indicated that he objects to a protective order. Counsel for Chambers does not object to a protective order, but requested that the language be amended and that the order govern only 3500 Material for civilian witnesses – amendments to the stipulation to which the Government does not object. However, in the absence of a stipulation agreed upon by all

defense counsel, the Government will be filing a motion for a protective order on or before September 8, 2014, the date on which additional motions *in limine* are due.

Respectfully submitted,

PREET BHARARA
United States Attorney

by: /S/ Santosh Aravind
Negar Tekeei/Santosh Aravind
Assistant United States Attorneys
(212) 637-2482/1045

cc: Eric Creizman, Esq. (by email)
Joshua Dratel, Esq. (by email)